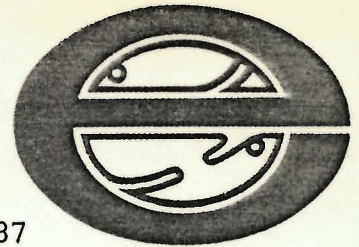


ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
NEW YORK, N.Y.

1987 SEP 29 AM 8:07

PERMITS ADMINISTRATION  
BRANCH

September 24, 1987



Mr. Joel Golumbek  
Hazardous Waste Compliance Branch  
U.S. Environmental Protection Agency  
Region 2  
26 Federal Plaza  
Room 1000  
New York, NY 10278

RE: Central Steel Drum - EPA ID No. NJD011482577

Dear Mr. Golumbek:

Environics represents and assists Central Steel Drum in many of their environmental compliance projects. We have been asked by Central Steel Drum to compile the documents requested in your letter of September 10, 1987 and are in the process of doing so. We hereby request a 30-day extension for the completion of the compilation of documentation and transmittal to your office. We presently have a meeting with Central Steel Drum set up for Monday, September 28, to go over all documentation. We will then transmit this material to your office for your review.

Please let me know if there are any problems with this request or if you have any questions.

Very truly yours,

ENVIRONICS

Bruce Doremus, P.E.  
Operations Manager

BD:dmd

cc: Mr. Richard Baker, U.S. EPA  
Mr. Alan Fischer, Central Steel Drum  
Mr. Jerry Greenberg, Central Steel Drums

**environics incorporated/environmental consultants**

46 JACKSON DRIVE • CRANFORD, NJ 07016-3580 • (201) 272-3770



SEP 10 1987

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
NEW YORK, NY

1987 SEP 11 AM 11:56

PERMITS ADMINISTRATION  
BRANCH

Mr. Gerry Greenberg  
Owner  
Central Steel Drum Company  
704 Doremus Avenue  
Newark, New Jersey 07105

Re: Information Concerning Central Steel Drum Company  
EPA I.D. No. NJD 011482577

Dear Mr. Greenberg:

The United States Environmental Protection Agency (EPA) is charged with responding to the release or threatened release of hazardous wastes and with enforcement responsibilities under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq.

Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information from parties who handle or have handled "hazardous wastes" as that term is defined in Section 1004(5) of RCRA, 42 U.S.C. §6904(5). Pursuant to the provisions of Section 3007, we hereby require that you provide the information requested in this letter.

Please provide the information listed in the attachment no later than 15 business days from receipt of this letter. The response must be signed by a responsible official.

The response to the request in the attachment must be mailed to the following addresses:

Joel Golumbek, Chief  
NJ/Caribbean Compliance Section  
Hazardous Waste Compliance Branch  
Air & Waste Management Division  
U.S. Environmental Protection Agency - Region II  
26 Federal Plaza, Room 1000  
New York, NY 10278

An additional copy of the response should be sent to:

Mr. Richard Baker, Chief  
Permits Administration Branch  
U.S. Environmental Protection Agency  
26 Federal Plaza, Room 432  
New York, NY 10278

Your failure to respond to this letter truthfully and accurately within the time provided, may subject the company to an enforcement action Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action may include the assessment of substantial penalties of up to \$25,000 per day for continued noncompliance. This information request meets the requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501 et seq.

You may, if you desire, assert a business confidentiality claim covering all or part of the information herein requested. The claim may be asserted by placing on (or attaching to) the information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice implying language such as "trade secret" or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent and by means of procedures set forth in 40 CFR Part 2. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.

If you elect to make a business confidentiality claim, EPA also solicits, pursuant to 40 CFR §2.204(e), your response to the following questions:

1. Which portions of the information do you claim to be entitled to confidential treatment?
2. How long do you want this information treated as confidential?
3. What measures have you taken to guard against undesired disclosures of the information to others?
4. To what extent has the information been disclosed to others, and what precautions have you taken in connection with these disclosures?
5. Has EPA or any other Federal Agency made a pertinent confidentiality determination? (If so, include a copy of this determination or reference to it, if available).
6. Will disclosure of the information be likely to substantially harm your competitive position? If so, what would the harm be, and why should it be viewed as substantial? What is the relationship between disclosure and the harm?
7. Do you assert that the information is voluntarily submitted as defined in 40 CFR §2.201 and, if so, would disclosure of the information tend to lessen the availability to EPA of similar information in the future? If so, why?

You may also assert a business confidentiality claim concerning your answers to the above questions. Any claim of confidentiality will be evaluated by EPA pursuant to the procedures in 40 CFR Part 2.

If you have any questions about this letter, you may call Mr. William Sawyer of the Office of Regional Counsel at (212) 264-5340; your cooperation is appreciated.

Sincerely yours,

Conrad Simon, Director  
Air and Waste Management Division

Attachment

cc: Karl Delaney, Chief  
Compliance and Technical Services, NJDEP, w/attach.

bcc: Thomas Solecki, 2AWM-HWC, w/attach.  
Laura Livingston, 2OPM-PA, w/attach. ✓  
William Sawyer, 2ORC-WTS, w/attach.  
George Meyer, 2AWM-HWC, w/attach.

ATTACHMENT

- ~ Facility Part A application.
- ~ Waste Analysis Plan.
- ~ Any laboratory analysis on: the sludge/wastewater before and after incineration (furnace), lead dust, waste pile and storm water collection pit.
- ~ Copy of personnel training records for the past three years.
- ~ Job descriptions and titles for positions related to RCRA.
- ~ Contingency Plan.
- ~ Any records of coordination with outside authorities.
- ~ Preparedness and prevention training records.
- ~ Action taken by your company to develop and implement testing, sampling and remediation of contaminated sections of the facility's property as required by the Consent Agreement reached on November 25, 1983 between EPA and your facility.